

## **REMARKS**

Reconsideration of the present application is respectfully requested. Claims 1-59 remain pending in this application.

### **Prior Art Under 35 U.S.C. § 102(e)**

Applicants respectfully traverse the citation of U.S. Patent No. 6,538,660 to Celi, Jr., et al. ("*Celi*") as invalidating prior art to the claimed invention. A patent reference does not qualify as prior art under § 102(e) unless the underlying application was filed before the invention by the applicant. 35 U.S.C. § 102(e). *See also* MPEP § 706.02(f)(1). Applicants claim priority to a provisional application filed on March 24, 1999. *Celi*, having a filing date of November 12, 1999, is not prior art under § 102(e).

### **Rejections under 35 U.S.C. § 102(e)**

In the Office Action, claims 1-59 were rejected under 35 U.S.C. § 102(e) as being anticipated by *Celi*. As explained above, *Celi* does not qualify as prior art under § 102(e). Therefore, Applicants traverse these prior art rejections and respectfully request withdrawal of the rejections.

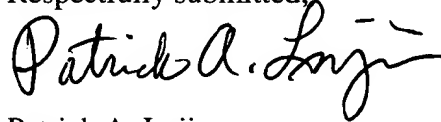
Accordingly, independent claims 1, 16, 28, 34, 35, 43, and 50 are patentable over the prior art of record and are in condition for allowance. Further, dependent claims 2-15 depend from independent claim 1, and are consequently in condition for allowance because they include each limitation of claim 1. Dependent claims 17-27 depend from independent claim 16, and are in condition for allowance because they include each limitation of claim 16. Dependent claims 29-32 depend from independent claim 28, and are in condition for allowance because they include each limitation of claim 28. Moreover, dependent claims 36-42 depend from independent claim 35, and are in condition for allowance because they include each limitation of claim 35. Dependent claims 44-50 depend from independent claim 43, and are in condition for allowance because they include each limitation of claim 43. Likewise, dependent claims 51-59 depend from independent claim 50, and are in condition for allowance because they include each limitation of claim 50.

## CONCLUSION

For the reasons stated above, claims 1-59 are in condition for allowance. Applicants respectfully request withdrawal of the pending rejections and a Notice of Allowance be issued in this case. If any issues remain that would prevent issuance of this application, the Examiner is urged to contact the undersigned prior to issuing a subsequent action. Pursuant to MPEP § 702.02, this application is to be considered "special" because it has been pending for five years.

The Director is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 19-2112.

Respectfully submitted,



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